



December 9, 2019

VIA ECF

Michael J. Broadbent

Direct Phone 215-665-4732

Direct Fax 215-701-2288

mbroadbent@cozen.com

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: Abraham v. Leigh, et al; No. 1:17-cv-05429
Letter Motion to Request Permission to File Under Seal

Dear Judge Failla:

As the Court is aware, we represent Defendant Abby Leigh, as Executrix of the Estate of Mitch Leigh, in the above-referenced action. We intend to file with the Court a response to the letter filed under seal on December 8, 2019, by Plaintiff Robyn Abraham.

Because the confidentiality asserted belongs to Plaintiff, and because the Court authorized the filing of such material under seal, we are not submitting a confidentiality Declaration or citation to case law supporting the filing under seal. The Executrix does not oppose the seal, however, as the bulk of Plaintiff's letter involves immaterial facts and personal attacks against the Executrix and her counsel, and thus should remain sealed for that reason independent of any confidentiality Plaintiff may assert.

Accordingly, we respectfully request permission to file the response letter under seal, and we thank the Court for its attention to these matters.

Sincerely,

COZEN O'CONNOR

/s/ Michael J. Broadbent

BY: MICHAEL J. BROADBENT

CC: All counsel of record via ECF

Application GRANTED.

SO ORDERED.

Dated: December 9, 2019
New York, New York

LEGAL\43989480\1

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE